

Dear Compliance Offset Protocol Task Force:

Offsets as part of California's Cap and Trade present something of a dilemma: on the one hand, if they work as intended, they can sequester carbon to counterbalance greenhouse gas emissions. They also have been a boon to some worthy land owners, including indigenous tribes and land trusts.

On the other hand there is significant evidence that they often do not work as intended. In which case greenhouse gases are emitted but not balanced. One analysis shows sham offset permits have been issued for 80 million CO2 equivalent tonnes – a third of the total emissions reductions planned through cap and trade by 2030. Another analysis says 80% of offsets “don't represent true emissions reductions.” Both figures are cited in an MIT Technology Review article: <https://www.technologyreview.com/2019/04/18/65883/californias-cap-and-trade-program-may-vastly-overestimate-emissions-cuts/>

The recent draft report, as well as some of the comments the Task Force has received, look to expanding offsets. Actions like making the offset program more accessible to small land owners and streamlining the verification process are likely to lead to more offset failures.

In my view your Task Force is responsible for cutting the chances for sham offsets down to virtually zero.

My recommendation is to restrict carbon offsets to those areas where empirical evidence exists that they consistently work over time, e.g. offsets bought from land trust organizations. This means that rather than opening up more offsets, as proposed in the report, you would be increasing scrutiny and closing down the ones that don't actually result in sequestering as much carbon as advertised.

Please redefine your job in this way rather than opening up more unbalanced greenhouse gas emissions.

Thank you for considering.

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